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**REMARKS**

Applicants thank the Examiner for consideration of this application.

**Claim amendments**

Currently, claims 1-11, 25 and 28-36 are pending. Claims 1, 25 and 28 are independent.

Applicants have amended independent claim 1 by clarifying that the steps of receiving a request from a non-technically trained user to establish a group of users, the request including a group identifier which includes a group name and password provided by the user and identifies the group; and allowing other non-technically trained users to join the group by using the group name and password.

Support for these amendments can be found in the application as originally filed, e.g., page 12, lines 2-3 and 27-29; the preamble of original claim 1 and original claim 33.

Similar amendments have been made to other independent claims 25 and 28.

Applicants have cancelled claims 7, 8 and 33 in view of the above amendments.

It is respectfully submitted that no new matter has been introduced into the application by these amendments. Entry of the amendments is respectfully requested.

**Claim Objections under 35 USC 112**

The Examiner has objected to claim 28 and its dependent claims for informalities in claim 28.

Applicant has replaced "from other users to a request" in claim 28 to "from other users a request", as suggested by the Examiner.

**Rejections under 35 USC 103**

The Examiner has rejected claims 1-6, 9-11, 25, 28-32 and 34-36 under 35 USC 103(a), alleging that these claims are unpatentable over Yuasa et al (US Patent 6,085,238; hereinafter "Yuasa") in view of Iijima et al (US patent 6,223,218, hereinafter "Iijima").

The Examiner has further rejected claims 7, 8 and 33 under 35 USC 103(a), alleging that these claims are unpatentable over Yuasa in view of Iijima in further view of Gage et al (US Patent 6,035,405; hereinafter called "Gage").

Applicants respectfully request reconsideration of these rejections for the reasons set out below based on the amended claims.

**Claim 1**

According to the invention as claimed in amended claim 1, a request is received from a non-technically trained user to establish a group of users. The request includes a group identifier which includes a group name and password provided by the user and identifies the group. Also, other non-technically trained users are allowed to join the group by using the group name and password.

Thus, a non-technically trained user can create a personal group (VLAN) on a network using a group name and password provided by the user. The user can define the group name and password. The group name and password can provide secure logins of the group. Other non-technically trained user can choose to join the group, by using the group name and password. The network infrastructure is configured to support creation of the group and joining users without intervention of information systems personnel. These group functions are initiated on-demand and deliberately by non-technically trained users.

In contrast, none of Yuasa, Iijima or Gage teach or suggest such a method.

Yuasa describes the dynamic creation and manipulation of various sorts of VLANs, including the IEEE802.1Q VLANs, based upon, e.g., in response to a "user's network

resource use request" (column 10, line 39-40; column 11, lines 24-26). This request is not a user's request for creation of a VLAN. The user is simply requesting use of resources. In order to make the requested resources available to the user, Yuasa's system automatically creates "a virtual network related to resource use of a different system" (column 10, lines 18-19; column 58, lines 43-45 and column 59 lines 14-16). The user is typically unaware of such creation of a VLAN related to resource use. This is very different from the present invention in which a user is requesting creation of a group of users per se. The user is fully cognizant of such creation of his/her group. In contrast, Yuasa does not describe creation of VLANs of which the user is wholly cognizant. Since Yuasa is directed to automatic creation of VLANs by its system without involving the user, there is no motivation for Yuasa to make the user to provide a group name or password for a VLAN. This is totally opposite to the present invention, in which the user provides a group name and password and explicitly requests creation of a group.

We agree with the Examiner that Yuasa does not teach allowing other users to join the group according to the group identifier. This is because Yuasa is directed to VLANs relating to resource use of a different system (column 10, lines 18-19). These resource related VLANs are not a group of users into which other users can join using the group identifier.

The Examiner alleged that Iijima discloses allowing other users to join the group according to the group identifier, referring to column 2, lines 13-24 and column 11, lines 13-32. In these sections, Iijima discusses the functions of a VLAN alteration request editing section 212 of a VAN alteration request section 21 of a switching hub 2. Iijima states that "when a terminal is connected to or removed from an Ethernet port of a switching hub communication function section 25 of a switching hub 2, the terminal movement detection section 213 in the switching hub 2 detects the event and activates the VLAN alteration request editing section 212" to send a VLAN alteration request to an automatic VLAN configuration information setting device 1, which in turn alters the configuration information (column 2, lines 3-29). The VLAN alteration is initiated by detection of an event in the switching hub 2.

Iijima does not describe any sort of user-initiated creation or manipulation of VLANs. Iijima does not describe how the VLAN is created. Iijima does not teach or suggest any creation of VLANs using of a group name and password provided by a user.

Amended claim 1 recites the feature of claim 7. In rejecting claim 7, the Examiner cited Gage in addition to Yuasa and Iijima.

As the Examiner has pointed out, the combined references Yuasa and Iijima do not teach the group identifier including a group name and password, and the step of allowing users to join the group according to a group name and password.

The Examiner has cited column 2, lines 38-43 and column 5, lines 34-38 of Gage in the attempt to show these features missing from Yuasa and Iijima.

In these sections, Gage discloses an authentication test, and examples of types of authentication tests include techniques based on passwords. In Gage's system, "the authentication server keeps track of which end stations are members of which VLAN, keeps track of which end stations are permitted to join which VLAN and performs authentication of end stations joining a VLAN" (column 2, lines 34-37). Accordingly, VLANs disclosed by Gage are pre-defined by a system administrator and the information as to which end stations is permitted to join which VLANs are stored in an internal database of a LAN emulation configuration server (LECS) 601 (column 4, lines 51-53). Gage's passwords are pre-defined by a system administrator who is technically trained. Those passwords are not provided by a non-technically trained user to create a VLAN.

Gage does not teach or suggest receiving a request from a user to establish a group of users, or allowing the user to provide a group name and password, or allowing other users to join a group using a group name and password that are provided by the user who created the group, as recited in amended claim 1 of the present application. Applicant is not claiming the use of passwords per se.

None of Yuasa, Iijima and Gage discloses or suggest receiving a request from a non-technically trained user to establish a group of users using a group identifier which

includes a group name and password provided by the user, or allowing other non-technically trained users to join the group by using the group name and password provided by the user. Accordingly, even if one skilled in the art attempts to combine these references, he would still fail to allow a user to provide a group name and password to create a group of users and allow other users to join the group using the group name and password. He would simply have a system to create a VLAN relating to resource use as per Yuasa or create a VLAN in response to detection of a network event as per Iijima, and manages predefined VLANs using predefined passwords as per Gage. He would not be achieve the method as recited in amended claim 1.

Therefore, it is respectfully submitted that amended claim 1 is patentable over any combination of the cited references and complies with the requirements under 35 USC 103.

#### Claim 25

Amended claim 25 also recites the features of receiving a request from a non-technically trained user to establish a group of users using a group identifier which includes a group name and password provided by the user, or allowing other non-technically trained users to join the group by using the group name and password provided by the user.

Accordingly, for the same reasons set out above, it is respectfully submitted that claim 25 has been patentably distinguished over any combinations of the cited references.

#### Claim 28

Amended claim 28 recites a server having a registration module to receive from a non-technically trained user a request to create a group of users, the request including a group identifier which includes a group name and password provided by the user and identifies a group of users, and to receive from other non-technically trained users a request to join the group using the group name and password.

The Examiner has noted that Yuasa uses a registration/routing table and VLAN ID, referring to column 10, 17-21, column 10, lines 50-55, column 25, lines 3-7 and column 39, lines 55-60).

Yuasa's registration/routing table receives requests for VLAN manipulation from other network components in response to user's actions or user resource requests (column 11, lines 22-26), rather than user's request for creating a VLAN, as discussed above. Accordingly, Yuasa's table does not correspond to the registration module of claim 28 of the present application.

Yuasa's VLAN ID is provided by the system. In Yuasa, the system automatically creates a VLAN related to resource use and the user is typically unaware of the creation of the VLAN, as discussed above. Thus, there is no motivation in Yuasa to ask the user to provide a VLAN ID. Thus, Yuasa does not teach or suggest use of any group name or password provided by the user.

Iijima teaches terminals, and more specifically, the ports to which those terminals are connected (column 13, lines 5-13), are automatically and transparently added to a VLAN simply by physically connecting to the switch (column 14, lines 9-15). Iijima does not describe any means "to receive from other users a request to join the group using the group name and password."

As discussed above, none of Yuasa, Iijima and Gage discloses or suggest a registration module as recited in amended claim 28.

Therefore, it is respectfully submitted that claim 28 has been patentably distinguished over the cited references, and is allowable under 35 USC 103.

#### Claims 2-6 and 9-11 and 29-36

These claims depend directly or indirectly on amended claim 1 or 28, respectively. Accordingly, Applicants trust that these claims are also patentable over the cited references.

Especially, claim 35 recites that the request received by our registration module can be a request to view the information defining a group of users. The Examiner cited Yuasa's column 50 lines 49-59. Yuasa in this section refers to a switch-switch or switch-server or server-switch means of communicating workgroup data. In contrast, claim 35 recites a request from the user for information associated with the group so that the user can read the information.

Accordingly, it is respectfully submitted that claim 35 is unobvious over Yuasa, Iijima and Gage and comply with the requirements under 35 USC 103.

Therefore, Applicants trust that the claims currently on file have been patentably distinguished over Yuasa, Iijima and Gage, and are patentable under 35 USC 103.


Claims 7, 8 and 33

The Examiner has rejected claims 7, 8 and 33 under 35 USC 103(a) based on Yuasa in view of Iijima in further view of Gage.

Claims 7, 8 and 33 have been cancelled.

It is submitted that Applicants have completely responded to the Office Action. Applicants submit that the currently pending claims as amended are in condition for allowance, which action is earnestly solicited.

Respectfully submitted,



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